

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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*In re* :  
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 THE FINANCIAL OVERSIGHT AND :  
 MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA  
 : Title III  
 as representative of : Case No. 17-BK-3283 (LTS)  
 : (Jointly Administered)  
 THE COMMONWEALTH OF PUERTO RICO *et al.*, :  
 :  
 Debtors.<sup>1</sup> :  
----- X  
 THE OFFICIAL COMMITTEE OF UNSECURED :  
 CREDITORS OF THE COMMONWEALTH OF :  
 PUERTO RICO, :  
 :  
 as agent of :  
 :  
 THE FINANCIAL OVERSIGHT AND :  
 MANAGEMENT BOARD FOR PUERTO RICO :  
 :  
 as representative of : Adv. Proc. No. 17-00257-LTS  
 THE COMMONWEALTH OF PUERTO RICO, :  
 :  
 Plaintiff, :  
 :  
 v. :  
 :  
 BETTINA WHYTE, :  
 :  
 as agent of :  
 :  
 THE FINANCIAL OVERSIGHT AND :  
 MANAGEMENT BOARD FOR PUERTO RICO :  
 :

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

as representative of  
THE PUERTO RICO SALES TAX FINANCING  
CORPORATION,  
Defendant.  
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**INFORMATIVE MOTION OF BETTINA M. WHYTE, IN HER CAPACITY  
AS AGENT FOR THE PUERTO RICO SALES TAX FINANCING CORPORATION  
(COFINA), REGARDING APPEARANCE AT THE APRIL 25-26, 2018 HEARING**

Pursuant to the Court’s *Order Relocating the April 25, 2018 Omnibus Hearing* [Dkt. No. 2886] (the “Hearing Procedures Order”), Bettina M. Whyte, in her capacity as the Court-appointed representative (“COFINA Agent”) for COFINA<sup>2</sup> in the Commonwealth-COFINA Dispute, respectfully notifies the Court of her intent to participate in the hearing to be held by the Court on April 25, 2018 with regard to the *Motion and Incorporated Memorandum of Law of the COFINA Agent to Certify Questions Under Puerto Rico Law to the Supreme Court of Puerto Rico* [Adv. Proc. Dkt. No. 329] (the “Certification Motion”). The COFINA Agent will be represented by Matthew A. Feldman, Antonio Yanez, Jr., and Alexander Cheney of Willkie Farr & Gallagher LLP and Kenneth N. Klee of Klee, Tuchin, Bogdanoff & Stern LLP, who will appear at the United States District Court for the Southern District of New York. Messrs. Feldman, Yanez, Cheney and Klee request to be seated at counsel’s table. In compliance with Local Civil Rule for the U.S. District Court for the District of Puerto Rico 83-A(f), local counsel for the COFINA Agent, Nilda M. Navarro-Cabrera, will attend the hearing at the United States District Court for the District of Puerto Rico. Mr. Yanez will present the argument on behalf of the COFINA Agent with regard to the COFINA Agent’s Certification Motion.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the *Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA Dispute* [Docket No. 996].

Dated: April 20, 2018  
New York, New York

Respectfully submitted,

By: /s/ Nilda M. Navarro-Cabrer  
Nilda M. Navarro-Cabrer  
(USDC – PR No. 201212)  
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*Local Counsel to the COFINA Agent*

Respectfully submitted,

By: /s/ Antonio Yanez, Jr.  
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Joseph G. Minias (*pro hac vice*)  
Antonio Yanez, Jr. (*pro hac vice*)  
Martin L. Seidel (*pro hac vice*)  
James C. Dugan (*pro hac vice*)  
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